

**REMARKS**

Reconsideration of this application and the new arguments below is respectfully requested. Claims 1, 3, 7, 8, 10, 11, 12, 15, 16, 18 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Uppaluru (US, 5,915,001) in view of Hunt et al. (US 6,094,476). Claims 2, 5, 6, 9, 13, 14, 17, 19, 20, 22 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Uppaluru (US 5,915,001) in view of Hunt et al. (US 6,094,476) as applied to claims 1, 15, 18 and 21 and further in view of Goldberg et al. (US 5,970,446). No claims have been amended, cancelled or added.

The Examiner has rejected claims 1, 3, 7, 8, 10, 11, 12, 15, 16, 18 and 21 under 35 U.S.C. §103(a) as being unpatentable over Uppaluru in view of Hunt. In regards to claim 1, The Examiner states:

However, Hunt teaches, "the system to use user-specific contextual information to dynamically change the voice user interface, wherein the voice user interface alters navigational options through the voice user interface that are presented to the user based upon environmental information at the location." (col. 2, lines 15-52 and col. 7, lines 41-58).

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However, Applicant asserts that claim 1 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Claim 1 states:

1. A system comprising:  
a user;

...

the system to use user-specific contextual information to dynamically change the voice user interface, wherein the voice user interface alters navigational options through the voice user interface that are presented to the user based upon environmental information at the location of the user.

(Emphasis Added)

Hunt does not disclose a user interface that alters navigational options based upon environmental information at the user's location. Hunt states:

Based upon the outcome of a quality evaluation, an interpreter facilitates navigation through speech IU menus or invocation of voice messaging functions, in conjunction with a speech UI structure, a voice messaging function library, and the recognition command generator. If the recognition results generator has determined that candidate results are questionable or ambiguous, the interpreter, in conjunction with an ambiguity resolution UI structure and recognition command generator, initiates confirmation operations in which the subscriber is prompted to confirm whether the best candidate result is what the subscriber intended.

(Hunt, col. 2, lines 33-44)

Hunt makes a quality evaluation on whether an interpreter recognizes and understands a user's response. Thus, Hunt merely evaluates the quality of a user response and whether an interpreter understood the response. If the response was ambiguous, the interpreter asks the user to verify if the interpreter properly interpreted the response. Hunt does not disclose or suggest a voice user interface that alters navigational options based upon environmental information at the user's location. If a reference does not discuss a limitation, then the reference cannot disclose that limitation.

Next, the Applicant also agrees with the Examiner that Uppaluru does not disclose or suggest, "a voice user interface that alters navigational options based upon environmental information at the user's location" as claimed in claim 1. Therefore, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest a voice user interface that alters navigational options based upon environmental information at the user's location. It is also respectfully submitted that

Hunt does not suggest a combination with Uppaluru, and Uppaluru does not suggest a combination with Hunt because Hunt specifically teaches away from such a combination. It would be impermissible hindsight to combine Uppaluru with Hunt based on applicants' own disclosure. Therefore, claim 1 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Given that claims 2-14 depend from and include the limitations of claim 1, claims 2-14 also are not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru.

In regards to independent claim 15, the Examiner states:

However, Hunt teaches, "user environmental information to change the voice user interface and altering the security characteristics presented to the user by the voice user interface based upon the environment information at the location of the user" (col. 4, lines 34-65).

(Office Action page 5)

However, Applicant asserts that claim 15 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Claim 15 states:

15. A method comprising:  
using user-specific contextual information to change a voice user interface;  
using environmental information to change the voice user interface; and  
altering the security characteristics presented to the user by the voice user interface based upon the environmental information at the location of the user.

(Emphasis Added)

Hunt does not disclose using environmental information to change the voice user interface. Hunt also does not disclose altering of security characteristics presented to the user based upon the environmental information at the location of the user. Hunts states:

As shown in FIG. 2, the preferred minimal set of speech UI menu options includes a menu for the entry of a subscriber's mailbox number; a menu for the entry of a subscriber's password; a main menu from which administrative operations or transfer to a message review menu can be selected... Additionally, the minimal set of speech UI menu options provides submenus for skipping, canceling, or confirming particular operations. This skilled in the art will recognize that additional menus and/or submenus can be provided.

(Hunt, col. 4, lines 41-52)

Hunt merely discloses the ability to alter the navigation of the voice user interface based on pre-configured sub menus. Nothing in Hunt teaches the use of such alterations of a voice user interface in regards to environmental information at the user's location. Applicant further submits that Hunt discloses the use of security characteristics (through password and mailbox prompts) in the voice user interface. However, Hunt does not disclose such security characteristics are alterable based upon environmental information at the user's location. In fact, Hunt does not disclose the use of environmental information in any regards. If a reference does not discuss a limitation, then the reference cannot disclose that limitation.

The Applicant also agrees with the Examiner that Uppaluru does not disclose or suggest, "user environmental information to change the voice user interface and altering the security characteristics presented to the user by the voice user interface based upon the environment information at the location of the user " as claimed in claim 15.

Therefore, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest "using environmental information to change the voice user interface."

Also, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest "altering the security characteristics presented to the user by the voice user interface based upon the environmental information at the location of the user. It is also

respectfully submitted that Hunt does not suggest a combination with Uppaluru, and Uppaluru does not suggest a combination with Hunt because Hunt specifically teaches away from such a combination. It would be impermissible hindsight to combine Uppaluru with Hunt based on applicants' own disclosure. Therefore, claim 15 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Given that claims 16-17 depend from and include the limitations of claim 15, claims 16-17 also are not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru.

As per independent claims 18 and 21, the Examiner has interpreted and thus rejected them for the same reasons set forth in the rejection of claim 15. Claim 18 states:

18. An apparatus comprising:  
means for using user-specific contextual information to change a voice user interface;  
means for using environmental information to change the voice user interface; and  
means for altering the security characteristics presented to the user by the voice user interface based upon the environmental information at the location of the user.

(Emphasis Added)

As discussed above, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest "a means for using environmental information to change the voice user interface." Also, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest "a means for altering the security characteristics presented to the user by the voice user interface based upon the environmental information at the location of the user." Therefore, claim 18 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Given that claims 19-20 depend

from and include the limitations of claim 18, claims 19-20 also are not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru.

Claim 21 states:

21. A machine-readable medium that provides instructions, which when executed by a machine, cause the machine to perform operations comprising:  
using user-specific contextual information to change a voice user interface; and  
using environmental information to change the voice user interface; and  
altering the navigational options through the user interface presented to the user by the voice user interface based upon the environmental information at the location of the user.

(Emphasis Added)

As discussed above, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest “a machine-readable medium that provides instructions for using environmental information to change the voice user interface.”

Also, the teachings of Hunt and Uppaluru, individually and/or combined, would not teach or suggest “ a machine-readable medium that provides instructions for altering the security characteristics presented to the user by the voice user interface based upon the environmental information at the location of the user. Therefore, claim 21 is not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru. Given that claims 22-23 depend from and include the limitations of claim 21, claims 22-23 also are not obvious under 35 U.S.C §103(a) in view of Hunt and Uppaluru.

**Conclusion**

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections and objections have been overcome. A Request for Continued Examination is submitted with this response. Applicants reserve all rights with respect to the application of the doctrine equivalents. If there are any additional charges, please charge them to our Deposit Account No. 02-2666. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Dated: \_\_\_\_\_

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